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August 8, 2022

SUBMITTED VIA ECF

Hon. Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

*Re: Letter Motion for Relief Concerning Judicial Mediation
Nonye Ikegwuoha v. Art Village Gallery, et al.
Case no. 1:21-cv-6263*

Dear Judge Forman:

Please accept this submission as a Letter Motion on behalf of the Defendants, Art Village Gallery and Sheila Urevbu (collectively the “Urevbu Defendants”), seeking relief concerning the in-person Judicial Mediation presently scheduled with Hon. Magistrate Valeria Figueredo for Wednesday, August 24, 2022 at 10:00 a.m.

a. Relief Requested

Specifically, the Urevbu Defendants respectfully move this Court (1) to relieve them their obligation of attending the presently scheduled Judicial Mediation on August 24, 2022, or (2) to allow them attend the Judicial Mediation remotely, so as to avoid the significant travel expenses required for both Ms. Urevbu and undersigned counsel to fly from Memphis, Tennessee to and from New York City between the evening hours of August 23, 2022 and August 24, 2022.

b. Good Cause in Support of Relief Requested

In support of their present request, the Urevbu Defendants would show the Court that the Plaintiff, Nonye Ikegwuoha (“Plaintiff”), did not file a response in opposition to the Motions for Summary Judgment (of either the Urevbu Defendants or co-Defendant, FedEx Ground Package System, Inc.) by the August 1, 2022 deadline set by this Court’s Order (ECF no. 69). Moreover, according to the Plaintiff’s last update to the Defendants regarding his travel schedule, he has not been cleared by the Consulate in Lagos, Nigeria to travel to New York for the Judicial Mediation, notwithstanding correspondence that was provided to the Consulate by all of the Defendants.

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c. Miscellaneous Development

Finally, on Friday, August 5, 2022, we received a Notice of Appearance on behalf of an attorney advising that he now represents the Plaintiff in this case. To the extent that Plaintiff's post-summary judgment retainer of counsel affects either the Urevbu Defendants' present request or any other matter in this case, undersigned counsel will make himself available in the event the Court would like to hear from the parties.

The Court's time and consideration of this Letter Motion are greatly appreciated.

Respectfully submitted,

/s/ Andrew M. Horvath
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*Attorneys for Defendants
Sheila Urevbu and Art
Village Gallery*

Any requests regarding the conference before Magistrate Judge Figueredo should be addressed to her. The Clerk of Court is directed to terminate ECF No. 86. SO ORDERED.

Cc: Matthew Sicheri, Esq. (via ECF & electronic mail)
Patrick O'keke, Esq. (via ECF & electronic mail)



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